

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

THE STATE OF ARIZONA, By and through
its Attorney General,
MARK BRNOVICH; *et al.*,

PLAINTIFFS,

v.

MERRICK GARLAND in his official capacity
as Attorney General of the United States of
America; *et al.*,

DEFENDANTS.

CIVIL ACTION No. 6:22-cv-01130

Assigned to the Hon. David C. Joseph

**PLAINTIFF STATES' UNOPPOSED MOTION FOR
A SECOND EXTENSION OF 60-DAYS TO FILE
SECOND AMENDED COMPLAINT**

Plaintiff States respectfully request to move the deadline to file their Second Amended Complaint, that was Ordered in (Doc. 079), for 60-days from August 22, 2022 to October 21, 2022. Defendants have indicated they do not have an objection to our requested extension.

The reason for the request is that this extension would move the deadline past the end of the federal fiscal year, when on information and belief Defendants are more likely to have useful reports on the numbers of asylees processed under the new system and which states such asylees are located in. In addition, the extension provides roughly four months of time (5/31 to 9/30) of actual implementation, which would be more statistically robust than any single month data.

Defendants do not waive any defenses to the Second Amended Complaint, with the same 14-day period following the filing of the Second Amended Complaint for the parties to confer on

a proposal for discovery and additional proceedings, before responding to the Second Amended Complaint.

Dated: August 19, 2022

Respectfully submitted,

MARK BRNOVICH
Attorney General
Brunn ("Beau") W. Roysden III *
Solicitor General
Drew C. Ensign **
Deputy Solicitor General
James K. Rogers **
Senior Litigation Counsel
OFFICE OF THE ARIZONA ATTORNEY
GENERAL
2005 North Central Avenue
Phoenix, AZ 85004
beau.roysden@azag.gov
drew.ensign@azag.gov
james.rogers@azag.gov

Counsel for Plaintiff State of Arizona

Steve Marshall
Alabama Attorney General
Edmund G. LaCour Jr.**
Solicitor General
Thomas A. Wilson **
Office of the Attorney General
State of Alabama
501 Washington Avenue
P.O. Box 300152
Montgomery, Alabama 36130-0152
Telephone: (334) 242-7300
Edmund.LaCour@AlabamaAG.gov

Counsel for Plaintiff State of Alabama

By: /s/ Joseph Scott St. John
ELIZABETH B. MURRILL (La #20685)
Solicitor General
JOSEPH SCOTT ST. JOHN (La #36682)
Deputy Solicitor General
LOUISIANA DEPARTMENT OF JUSTICE
1885 N. Third Street
Baton Rouge, Louisiana 70804
Tel: (225) 326-6766
murrille@ag.louisiana.gov
stjohnj@ag.louisiana.gov

Counsel for Plaintiff State of Louisiana

ERIC S. SCHMITT
Attorney General
D. JOHN SAUER *
Solicitor General
OFFICE OF THE MISSOURI
ATTORNEY GENERAL
Supreme Court Building
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
John.Sauer@ago.mo.gov

Counsel for Plaintiff State of Missouri

Treg R. Taylor
Attorney General of Alaska
CORI M. MILLS**
Deputy Attorney General of Alaska
Christopher A. Robison**
Assistant Attorney General
Alaska Department of Law
1031 West 4th Avenue, Suite 200
Anchorage, AK 99501-1994
chris.robison@alaska.gov

Counsel for Plaintiff State of Alaska

LESLIE RUTLEDGE
Arkansas Attorney General
NICHOLAS J. BRONNI*
Solicitor General
DYLAN L. JACOBS*
Deputy Solicitor General
OFFICE OF THE ARKANSAS
ATTORNEY GENERAL
323 Center Street, Suite 200
Little Rock, Arkansas 72201
(501) 682-2007
Nicholas.Bronni@arkansasag.gov
Dylan.Jacobs@arkansasag.gov

Counsel for Plaintiff State of Arkansas

CHRISTOPHER M. CARR
Attorney General of Georgia
STEPHEN J. PETRANY**
Solicitor General
OFFICE OF THE GEORGIA
ATTORNEY GENERAL
40 Capitol Square, SW
Atlanta, Georgia 30334
(404) 458-3408
spetrany@law.ga.gov

Counsel for Plaintiff State of Georgia

THEODORE E. ROKITA
Indiana Attorney General
Betsy M. DeNardi**
Director of Complex Litigation
Indiana Government Center South
302 W. Washington St., 5th Floor
Indianapolis, IN 46204
Betsy.DeNardi@atg.in.gov

Counsel for Plaintiff State of Indiana

ASHLEY MOODY
Attorney General
JAMES H. PERCIVAL*
Deputy Attorney General of Legal Policy
OFFICE OF THE FLORIDA
ATTORNEY GENERAL
The Capitol, PL-01
Tallahassee, Florida 32399-1050
Phone: (850) 414-3300
james.percival@myfloridalegal.com

Counsel for Plaintiff State of Florida

Lawrence G. Wasden
Attorney General,
Brian Kane**
Chief Deputy Attorney General
Office of the Idaho Attorney General
700 W. Jefferson Street, Ste. 210
P.O. Box 83720
Boise, ID 83720
Telephone: (208) 334-2400
Email: Brian.Kane@ag.idaho.gov

Counsel for Plaintiff State of Idaho

Derek Schmidt
Attorney General
Dwight R. Carswell**
Deputy Solicitor General
Office of the Kansas Attorney General
120 SW 10th Ave., 3rd Floor
Topeka, KS 66612-1597
dwight.carswell@ag.ks.gov

Counsel for Plaintiff State of Kansas

DANIEL CAMERON
Attorney General of Kentucky
Marc Manley**
Associate Attorney General
Kentucky Office of the
Attorney General
700 Capital Avenue, Suite 118
Frankfort, Kentucky
Tel: (502) 696-5478

*Counsel for Plaintiff Commonwealth of
Kentucky*

LYNN FITCH
Attorney General of Mississippi
JUSTIN L. MATHENY*
Deputy Solicitor General
OFFICE OF THE MISSISSIPPI
ATTORNEY GENERAL
P.O. Box 220
Jackson, MS 39205-0220
Tel: (601) 359-3680
justin.matheny@ago.ms.gov

Counsel for Plaintiff State of Mississippi

DOUGLAS J. PETERSON
Attorney General
JAMES A. CAMPBELL**
Solicitor General
OFFICE OF THE NEBRASKA ATTORNEY
GENERAL
2115 State Capitol
Lincoln, Nebraska 68509
Tel: (402) 471-2682
jim.campbell@nebraska.gov

Counsel for Plaintiff State of Nebraska

AUSTIN KNUDSEN
Attorney General
DAVID M.S. DEWHIRST*
Solicitor General
MONTANA DEPARTMENT OF JUSTICE
215 N Sanders St
Helena, MT 59601
P. (406) 444-2026
David.Dewhirst@mt.gov

Counsel for Plaintiff State of Montana

JOHN M. O'CONNOR
Attorney General of Oklahoma
BRYAN CLEVELAND**
Deputy Solicitor General
OKLAHOMA ATTORNEY GENERAL'S
OFFICE
313 NE 21st Street
Oklahoma City, OK 73105
Phone: (405) 521-3921

Counsel for Plaintiff State of Oklahoma

Sean D. Reyes
Utah Attorney General
Melissa Holyoak**
Utah Solicitor General
350 N. State Street, Suite 230
P.O. Box 142320
Salt Lake City, UT 84114-2320
(801) 538-9600
melissaholyoak@agutah.gov

Counsel for Plaintiff State of Utah

ALAN WILSON
South Carolina Attorney General
Thomas T. Hydrick**
Assistant Deputy Solicitor General
Post Office Box 11549
Columbia, SC 29211
(803) 734-4127
thomashydrick@scag.gov

Counsel for the State of South Carolina

Patrick Morrissey
Attorney General
Lindsay See**
Solicitor General
Office of the West Virginia Attorney General
State Capitol, Bldg 1, Room E-26
Charleston, WV 25305
(681) 313-4550
Lindsay.S.See@wvago.gov

Counsel for Plaintiff State of West Virginia

BRIDGET HILL
Attorney General of Wyoming
RYAN SCHELHAAS**
Chief Deputy Attorney General
OFFICE OF THE WYOMING ATTORNEY
GENERAL
109 State Capitol
Cheyenne, WY 82002
Tel: (307) 777-5786
ryan.schelhaas@wyo.gov

Counsel for Plaintiff State of Wyoming

* Pro hac vice application forthcoming

** Pro hac vice application granted

CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2022, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the Western District of Louisiana by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

/s/ Joseph Scott St. John
JOSEPH SCOTT ST. JOHN